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BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION SERVICE CHANGES, 2011

Docket No. N2012-1

RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MEHRA TO AMERICAN POSTAL WORKERS UNION, AFL-CIO INTERROGATORY REDIRECTED FROM WITNESS WILLIAMS (APWU/USPS-T1—28) (March 16, 2012)

The United States Postal Service hereby files its response to the above-listed interrogatory of the American Postal Works Union, AFL-CIO, dated February 17, 2012. The interrogatory has been redirected from witness Williams to witness Mehra for response. The interrogatory is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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APWU/USPS-T1—28 On page 6 of the aforementioned webinar presentation, it states that BMEU will not change in the near term.

- a) Please define "near term" in this context?
- b) Some AMP summaries indicate that business mail acceptance may move to another local office (for example, see the summaries for Asheville, NC November 16, 2011 revised, Beaumont, TX December 19, 2011, Brockton, MA December 23, 2011, Cincinnati, OH November 14, 2011, Columbus, GA October 21, 2011.) Will these moves only take place after "the near term"?
- c) What factors determine whether or not a BMEU will remain at the facility or be moved?

RESPONSE:

- a) In this context, "near term" indicates that there will be no immediate changes in BMEU operations. Further, if any changes are made, mailers will be provided 120 days' advance notice. See also the responses to NAPM/USPS-T7—1(a) and NAPM/USPS-T7—7(a).
- b) Yes, see the response to subpart (a).
- c) The Postal Service expects each BMEU to remain in its current location until the facility is sold or vacated. In most cases, we do not expect a BMEU to remain in its current location when no other USPS presence is maintained within the impacted facility. In the event that a BMEU is relocated or consolidated, we will aim to locate it within close proximity to the old location. See also the responses to NAPM/USPS-T7—1(a) and NAPM/USPS-T7—7(a).